

DECLARATION OF MATTHEW BRAY

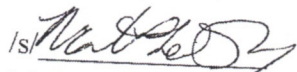
I, Matthew Bray, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently and truthfully to these matters.
2. I am the owner attorney at the Law Office of Matthew Bray, which is located at 119 West 23rd Street, Suite 900, New York, NY 10011.
3. I am an attorney in good standing in the state of New York. I am admitted in the Southern District of New York, the Eastern District of New York, the Second Circuit Court of Appeals, and the D.C. Circuit Court of Appeals. I specialize in the practice of immigration law.
4. I was recently retained to represent Nickesha Scott, in immigration matters before ICE. I had previously entered a limited representative appearance for her in the Immigration Court in New York City, assisting her with the document preparation of her I-589 asylum application, declaration and evidence submission, the latter two of which were filed in open court at her master calendar hearing on Friday, September 5, 2025.
5. Upon information and belief, Ms. Scott was taken into custody and detained by Immigration and Customs Enforcement ("ICE") at 26 Federal Plaza, New York, NY, on Friday, September 5, 2025, immediately after her master calendar hearing. On that day and the following days, the Online Detainee Locator System showed that her "current detention facility" was "26 Federal Plaza." Upon information and belief, my client was detained at 26 Federal Plaza since her detention on September 5 through September 9 or 10.
6. After her detention, Ms. Scott's family and friends tried to contact her as quickly as possible. Not only does Ms. Scott have several legal remedies available to her, including asylum and release on bond, but I also worried that she was being held in dangerous, inhumane conditions. Ms. Scott suffers from chronic medical conditions including fibroids and cysts requiring a hysterectomy in 2024, and I wanted to make sure that she was receiving any needed medication and medical care.
7. On Tuesday, September 9, 2025, I emailed NYCDetaineeInquiry@ice.dhs.gov along with a duly executed Form G-28, requesting a legal call as soon as possible. I received a response later that day from "V.A." with the NYC ERO field office, indicating that the "this week's schedule for calls [was] full," and asking me to choose from a schedule of times for the following week. I was not provided a reason why the field office would not comply with the order in *Barco Mercado v. Noem* requiring facilitation of a legal call

within 6 hours of the request. I accepted the earliest available appointment offered which was for 6 days later, Monday September 15 at 8am.

8. Unfortunately, my client was subsequently transferred to a detention facility in Louisiana on or about September 9 or 10. As of September 10, the ICE detainee locator currently indicates she is being held under the jurisdiction of the New Orleans ERO field office. I have not been contacted by anyone at either field office regarding the request for the legal call, and it is not clear whether the New Orleans field office will respect the call I scheduled with the New York field office.
9. Annexed to my declaration as an exhibit is a true and correct copy of the emails I have sent and received using my email address, mattbraylaw@protonmail.com, corresponding with the field office employee at NYCDetaineeInquiry@ice.dhs.gov.

Executed on 10 of September, 2025, at New York, New York.

/s/ 

Matthew Bray, Esq.,
Law Office of Matthew Bray
119 West 23rd Street, Suite 900
New York, NY 10011
(646) 253-0580

EXHIBIT 1

RE: [REDACTED] (Nickesha Scott) - REQUEST FOR LEGAL CALL

From Matthew Bray <mattbraylaw@protonmail.com>
To NYCDetaineeInquiry, <NYCDetaineeInquiry@ice.dhs.gov>
Date Tuesday, September 9th, 2025 at 3:18 PM

(929) 256-5908 is correct.

If for some reason that doesn't work, feel free to try 347-417-4102.

Thank you,

Matthew Bray, Esq.

Pronouns: he/him

Law Office of Matthew Bray
119 West 23rd Street, Suite 900
New York, NY 10011
(929) 256-5908

Sent with Proton Mail secure email.

On Tuesday, September 9th, 2025 at 3:15 PM, NYCDetaineeInquiry, <NYCDetaineeInquiry@ice.dhs.gov> wrote:

Your legal call is scheduled for Monday 9/15 @0800 for [REDACTED]. You will receive a call to number on file (929) 256-5908.

Please confirm the number on file.

V.A.

Enforcement and Removal Operations

New York Field Office

U.S. Immigration and Customs Enforcement

201 Varick St RM 1219

New York, NY 10014

From: Matthew Bray <mattbraylaw@protonmail.com>

Sent: Tuesday, September 9, 2025 2:45 PM

To: NYCDetaineeInquiry, <NYCDetaineeInquiry@ice.dhs.gov>

Cc: Nathan Yaffe <nathan.yaffe@protonmail.ch>; Noah Habeeb <nhabeeb@cbst.org>; Laura Clark <lclark@cbst.org>

Subject: RE: [REDACTED] (Nickesha Scott) - REQUEST FOR LEGAL CALL

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Thank you,

I will take Monday 9/15 at 8am.

Please advise if I should receive the call or if I should call a particular number.

Best,

Matthew Bray, Esq.

Pronouns: he/him

Law Office of Matthew Bray

119 West 23rd Street, Suite 900

New York, NY 10011

(929) 256-5908

Sent with [Proton Mail](#) secure email.

On Tuesday, September 9th, 2025 at 2:38 PM, NYCDetaineeInquiry, <NYCDetaineeInquiry@ice.dhs.gov> wrote:

This week's schedule for calls is full. Next week's schedule is open.

Please choose from the available options below

Tuesday 9/16 : 8am, 9am, 10am, 11am, 1pm, 2pm

Wednesday 9/17 : 8am, 9am, 10am, 11am, 12pm, 1pm, 2pm

Thursday 9/18 : 8am, 9am, 10am, 11am, 1pm, 2pm

Friday 9/19 : 8am, 9am, 10am, 11am, 12pm, 1pm, 2pm

V.A.

Enforcement and Removal Operations

New York Field Office

U.S. Immigration and Customs Enforcement

201 Varick St RM 1219

New York, NY 10014

From: Matthew Bray <mattbraylaw@protonmail.com>

Sent: Tuesday, September 9, 2025 2:05 PM

To: NYCDetaineeInquiry, <NYCDetaineeInquiry@ice.dhs.gov>

Subject: [REDACTED] (Nickesha Scott) - REQUEST FOR LEGAL CALL

You don't often get email from mattbraylaw@protonmail.com. [Learn why this is important](#)

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Good afternoon,

Please see attached completed G-28 for Nickesha Scott ([REDACTED]).

Thank you for your cooperation.

Matthew Bray, Esq.

Pronouns: he/him

Law Office of Matthew Bray

119 West 23rd Street, Suite 900

New York, NY 10011

(929) 256-5908

Sent with Proton Mail secure email.